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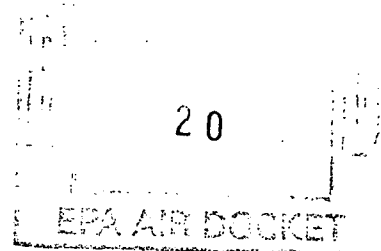
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ASSOCIATION OF INTERNATIONAL AUTOMOBILE MANUFACTURERS, INC.

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Docket A-90-16
Room M-1500 (LE-131)
U.S. Environmental Protection Agency
401 M Street SW.
Washington, DC 20460

Subject: Comments on the Ethyl Corporation
Application for a Fuel Additive Waiver
(Docket A-90-16)

On behalf of our member companies, the Association of International Automobile Manufacturers (AIAM) submits the following comments for consideration by EPA in reviewing the Ethyl Corporation application for a waiver from the restrictions of Section 211(f)(3) of the Clean Air Act for the use of the gasoline additive MMT, to be labeled as the performance additive HiTEC 3000, in unleaded gasoline.

The first and foremost concern with the Ethyl Corporation application is with regard to Ethyl's test results indicating increased levels of hydrocarbon emissions. While Ethyl Corporation claims the increase in hydrocarbon emissions is slight and does not cause non-compliance with the current hydrocarbon emission standard, an increase in hydrocarbon emission levels of any magnitude is of major concern to motor vehicle manufacturers as enacted state regulations and proposed Federal legislation call for significant reductions in hydrocarbon emission levels in the near term.

While Appendix 11 of the Ethyl Corporation application attempts to address future emission standards, it is inadequate in that it assumes future hydrocarbon emission levels to be equal to 0.31 grams per mile (gpm). Regulations currently proposed by the state of California call for hydrocarbon emissions to be reduced to levels as low as 0.040 gpm for some models as early as the 1995 model year. Given current state and Federal actions to reduce hydrocarbon emission levels, it is clear that the

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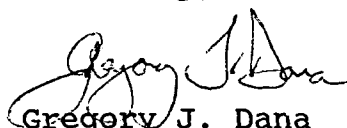
Ethyl Corporation application for waiver is grossly counterproductive to current regulatory and industry efforts.

A second major concern with the Ethyl Corporation application is with regard to Ethyl's belief that the use of MMT as a performance additive has no adverse effects on emission control related devices. This may not be the case. In Canada, where the Ethyl Corporation claims to have experienced great success with MMT, automobile manufacturers continue to gather additional evidence demonstrating that, contradictory to what Ethyl believes, MMT is indeed a major contributing factor to failing emission control devices. Numerous reports of plugged catalysts and fouled oxygen sensors have lead the Canadian General Standards Board (CGSB) to embark on a study of the matter. A report from the CGSB is expected sometime in the near future. Given an unknown such as this, AIAM believes that EPA should refrain from acting on the Ethyl Corporation application until it can be stated with some degree of certainty that MMT does not contribute to the failure of emission control related devices.

The third concern with the Ethyl Corporation application is with regard to toxicity. MMT is a neurotoxin and more study effort should be put into the possible long term health consequences of this additive before its use is considered. Our past experience with lead as a fuel additive should urge caution in this regard.

We believe that the Ethyl waiver should be denied for the reasons stated above. If there are any questions on these comments, please contact me.

Sincerely,



Gregory J. Dana
Vice President and
Technical Director

cc: Ms. Mary Smith, FOSD